

HUD LOGO

U.S. Department of Housing and Urban Development  
Washing, D.C. 20410-8000

OFFICE OF THE ASSISTANT SECRETARY  
FOR HOUSING – FEDERAL HOUSING COMMISSION

AUG 1, 1997

Mr. Alan Murray  
16825 Highway 101 N.  
Smith River, California 95567

Dear Mr. Murray:

This is in response to your letters of July 25 and 28, 1997, addressed to Mr. Rick Mendlen of my staff, concerning whether certain construction used in park models subjects them to HUD's authority under the Manufactured Housing Act and Standards.

Specifically, you have asked if lofts in park model units which are less than 5'-0" in ceiling height are to be included in determining whether a structure is within or exceeds the 400 square foot or less requirement to be considered a recreational vehicle under the Department's Regulations, 24 CFR 3282.8(g) and Enforcement Interpretative Bulletin A-1-88.

Although this matter was not addressed in A-1-88, it has been the Department's practice not to consider areas which are less than 5'-0" in height as part of the gross floor area (24 CFR 3280.102 and .104). In view of this practice, any loft area which is less than 5'-0" in height would not have to be considered in determining whether a structure was subject to the Department's Standards and Regulations. However, this decision does not, in any way, affect actions which the Department of Housing and Community Development of the State of California may take under state law and authority to regulate the construction of park trailers.

If you have any questions, please contact Mr. Rick Mendlen of my staff at (202) 708-6423

Sincerely,

David R. Williamson  
Director  
Office of Consumer and  
Regulatory Affairs

**This Document was re-typed to improve legibility**